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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS**

In re:

FORE MACHINE, LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 22-40487
)

) (Jointly Administered)
)

**MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING ON
EMERGENCY MOTION OF NEWSRING MEZZANINE CAPITAL III, L.P. AND
SOUTHFIELD MEZZANINE CAPITAL, L.P. FOR DETERMINATION OF
EFFECTIVE DATE OF AERO COMPONENTS, LLC PLAN OF REORGANIZATION**

TO THE HONORABLE MARK X. MULLIN, U.S. BANKRUPTCY JUDGE:

NewSpring Mezzanine Capital III, L.P. (“NewSpring”) and Southfield Mezzanine Capital,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Fore Machine, LLC (1850), Fore Aero Holdings, LLC (2671), Fore Capital Holding, LLC (2920), and Aero Components, LLC (8616). The service address for Fore Aero Holdings, LLC, Fore Machine, LLC, and Fore Capital Holding, LLC is: 5933 Eden Drive, Haltom City, TX 76117. The service address for Aero Components, LLC is 5124 Kaltenbrun Rd, Fort Worth, Texas 76119.

L.P. (together with NewSpring, the “Lenders”), by and through their undersigned counsel, hereby request that an expedited hearing be scheduled on their *Emergency Motion for Determination of Effective Date of Aero Components, LLC Plan of Reorganization* [Docket No. 436](the “Emergency Motion”) and in support thereof would respectfully state the following:

1. Pursuant to the Emergency Motion, the Lenders request an order from the Court determining that the Effective Date under the *First Amended and Restated Aero Component LLC’s Chapter 11 Plan of Reorganization* (the “Amended Aero Plan.”) [Docket No. 329] has occurred and requiring the Debtor to immediately file a Notice of Occurrence of Effective Date. Due to the significant negative impact of any further delay on Aero’s business and its relationship with the employees and customers, it is imperative that the Plan go effective immediately, as contemplated, and that the Reorganized Debtor begin making payments as required under the Plan and continue operations outside of Chapter 11. The Lenders have attempted in good faith to obtain the cooperation of the Debtor and its management to acknowledge the occurrence of the effective date and avoid this required intervention by the Court. The basis of such relief is more particularly set forth in the Emergency Motion which is incorporated herein by reference.

2. Under the circumstances, the Lenders request that the Court schedule a hearing on the Emergency Motion at the earliest possible date. Absent relevant documents or arguments yet to be raised by the Debtor, the Lenders believe that the hearing should take less than an hour of the Court’s time.

WHEREFORE, the Lenders respectfully requests that the Court schedule a hearing on the Emergency Motion at the earliest possible date and grant such other relief as may be just and proper.

Dated: June 3, 2022

/s/ Joe E. Marshall

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CERTIFICATE OF CONFERENCE

On June 3, 2022, the undersigned contacted counsel for the Debtor via telephone (and during the several days prior thereto via email and telephone) regarding the need for relief under the Emergency Motion. Counsel for the Debtor opposes the relief in the Emergency Motion. Counsel does not oppose the scheduling of the Emergency Motion on an expedited basis.

/s/Robert Lapowsky
Robert Lapowsky